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and Seagate Technology International*

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: HARD DISK DRIVE SUSPENSION  
ASSEMBLIES ANTITRUST LITIGATION

Case Nos. 3:19-md-02918-MMC  
3:20-cv-01217-MMC

MDL No. 2918

THIS DOCUMENT RELATES TO:

*Seagate Technology LLC et al. v. Headway  
Technologies, Inc. et al.*, Case No. 3:20-cv-  
01217-MMC

**AMENDED STIPULATION AND  
~~PROPOSED~~ ORDER OF  
DISMISSAL WITH PREJUDICE BY  
SEAGATE PLAINTIFFS AND TDK  
DEFENDANTS**

Hon. Maxine M. Chesney

1 Plaintiffs Seagate Technology LLC, Seagate Technology (Thailand) Ltd., Seagate Singapore  
2 International Headquarters Pte. Ltd., and Seagate Technology International (collectively, “Seagate”)  
3 and Defendants TDK Corporation, Hutchinson Technology Inc., Headway Technologies, Inc.,  
4 Magnecomp Precision Technology Public Co., Ltd., and SAE Magnetics (H.K.) Ltd. (collectively,  
5 “TDK”), by and through undersigned counsel, stipulate and agree that Seagate hereby dismisses  
6 with prejudice all claims being asserted against TDK in the above-captioned actions pursuant to the  
7 Federal Rules of Civil Procedure 41(a)(1)(A)(ii) and 41(a)(2). In support of this stipulation of  
8 dismissal, the parties state as follows:

- 9 1. Seagate and TDK seek the dismissal of this action against TDK with prejudice.
- 10 2. This stipulation does not affect the rights or claims Seagate has or may have against any  
11 other defendant or alleged co-conspirator in this litigation.
- 12 3. Each party shall bear its own costs, expenses, and attorneys’ fees.

13 WHEREFORE, the parties respectfully request that the Court issue the [Proposed] Order of  
14 Dismissal.

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16 **IT IS SO STIPULATED.**  
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1 Dated: April 5, 2022

Respectfully submitted,

2  
3 /s/ Kenneth R. O'Rourke

Kenneth R. O'Rourke

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Mikaela E. Evans-Aziz

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12 *Seagate Technology (Thailand), Ltd., Seagate*  
13 *Singapore International Headquarters Pte. Ltd.,*  
14 *and Seagate Technology International*

15 /s/ J. Clayton Everett, Jr.

J. Clayton Everett, Jr. (*pro hac vice*)

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25 *Hutchinson Technology Inc., Headway*  
26 *Technologies, Inc., Magnecomp Precision*  
27 *Technology Public Co., Ltd., and SAE Magnetics*  
28 *(H.K.) Ltd.*

**ATTORNEY ATTESTATION**

I, Kenneth R. O'Rourke, hereby attest, pursuant to Civil Local Rule 5-1(h)(3) of the Northern District of California, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 5, 2022

/s/ Kenneth R. O'Rourke  
Kenneth R. O'Rourke

*Counsel for Plaintiffs Seagate Technology LLC,  
Seagate Technology (Thailand), Ltd., Seagate  
Singapore International Headquarters Pte. Ltd.,  
and Seagate Technology International*

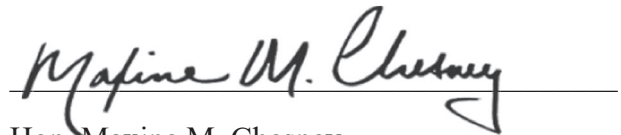
**~~PROPOSED~~ ORDER**

Pursuant to stipulation and upon good cause, the Court ORDERS the following:

Pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii) and 41(a)(2), all claims asserted in the above-captioned actions by Plaintiffs Seagate Technology LLC, Seagate Technology (Thailand) Ltd., Seagate Singapore International Headquarters Pte. Ltd., and Seagate Technology International (collectively, "Seagate") against Defendants TDK Corporation, Hutchinson Technology Inc., Headway Technologies, Inc., Magnecomp Precision Technology Public Co., Ltd., and SAE Magnetics (H.K.) Ltd. (collectively, "TDK") are DISMISSED WITH PREJUDICE. This dismissal does not affect the rights or claims Seagate has or may have against any other defendant or alleged co-conspirator in this litigation. Each party shall bear its own costs and attorney's fees.

**IT IS SO ORDERED.**

Dated: April 8, 2022

  
Hon. Maxine M. Chesney  
United States District Judge